

EDELMAN, COMBS, LATTURNER & GOODWIN, LLC

20 S. Clark Street, Suite 1500

Chicago, Illinois 60603

Phone (312)739-4200

Fax (312)419-0379

November 5, 2020

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/5/2020

The Honorable Mary Kay Vyskocil U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Hayles v. Waldman Sagginario & Associates, PLLC
Case No.: 1:16-cv-08919-MKV-SA

Dear Judge Vyskocil:

Plaintiff, Gregory Hayles, and Defendant Waldman, Sagginario & Associates, PLLC, respectfully submit this joint letter requesting that the Court (1) reset the telephonic conference currently scheduled for October 9, 2020, and (2) extend the parties' deadline to submit a joint pre-trial order until January 11, 2021, 21 days after the parties' settlement conference with Magistrate Judge Aaron.

On October 26, 2020 this Court entered an Order referring this matter to the Magistrate Judge for settlement (Dkt No. 111). Subsequently, this Court entered an Order setting a telephonic conference for November 9, 2020 at 11:00 a.m., and directed the parties to be prepared to discuss scheduling trial and all pre-trial matters.

On November 4, 2020, Magistrate Judge Aaron entered an Order scheduling a settlement conference in this case for December 16, 2020 at 2:00 p.m. In light of the upcoming settlement conference, the parties respectfully request that the Court reset the October 9, 2020 telephonic conference and the deadline for the parties to submit their joint pre-trial order until 21 days after the parties' settlement conference on December 16, 2020.

Proceeding with trial preparation while simultaneously attempting to engage in good faith settlement negotiations may hinder the parties' efforts to reach an amicable resolution and also may result in a waste of judicial resources.

Rescheduling the telephonic status and the deadline to submit the pretrial order January 11, 2021 allows the parties to focus their time and resources on meaningful settlement efforts.

This is the parties' first request for an adjournment of the November 9, 2020 telephonic conference as well as their first request for an extension of the pre-trial order deadline. The undersigned has conferred with counsel for defendant, and counsel for defendant joins in this requested relief.

Respectfully submitted,

s/Tiffany N. Hardy

Tiffany N. Hardy
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
20 S. Clark Street, Suite 1500
Chicago, Illinois 60603-3593
(312) 739-4200
(312) 419-0379 (FAX)

s/ Kelly Kalahar

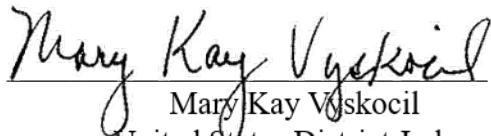
Kelly Kalahar
Waldman, Kalahar & Associates, PLLC
P.O. Box 5162
Largo, FL 33779
(844)-899-4162
Fax: (844)-899-4162
Email: kelly@dwaldmanlaw.com

s/Abraham Kleinman

Abraham Kleinman
Kleinman LLC
626 RexCorp Plaza
Uniondale, NY 11556-0626
(516) 522-2621
Fax: (888) 522-1692
Email: akleinman@kleinmanllc.com

The parties' request to adjourn the pretrial conference scheduled for November 9, 2020, at 11:00 AM is DENIED. The parties should be prepared to discuss scheduling of trial and all pretrial matters. The Court will consider settlement efforts in setting deadlines.

Date: 11/5/2020
New York, New York


Mary Kay Vyskocil
United States District Judge